

PHILLIP A. TALBERT  
United States Attorney  
JAMES R. CONOLLY  
Assistant United States Attorney  
501 I Street, Suite 10-100  
Sacramento, CA 95814  
Telephone: (916) 554-2700  
Facsimile: (916) 554-2900

Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.

SARAH ANDERSON,  
FABIAN GOMEZ,  
EPIFANIO RAMIREZ,  
WENDY LABUDA,  
WILLIAM OWEN,  
JOALEEN ROGERS,

Defendants.

CASE NO. 2:22-CR-147-WBS

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
ORDER

DATE: February 27, 2023  
TIME: 9:00 a.m.  
COURT: Hon. William B. Shubb

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. This case is set for a status conference on February 27, 2023.
2. By this stipulation, defendants now move to continue the status conference until April 3, 2023 at 9:00 a.m., and to exclude time between February 27, 2023, and April 3, 2023, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has produced discovery in this matter, consisting of over 1,300 pages of investigative reports and photographs. The government is also in the process of making

1 available to the defense video surveillance evidence for multiple controlled drug buys.

2 b) Counsel for defendants have met with their clients to discuss their respective  
3 cases. Defense counsel desire additional time to conduct investigation into the charges, the  
4 alleged roles of their respective clients, and to review discovery in this case. Defense counsel  
5 will need additional time to discuss potential resolutions with their clients, prepare pretrial  
6 motions, and otherwise prepare for trial.

7 c) Counsel for defendants believe that failure to grant the above-requested  
8 continuance would deny them the reasonable time necessary for effective preparation, taking into  
9 account the exercise of due diligence.

10 d) The government does not object to the continuance.

11 e) Based on the above-stated findings, the ends of justice served by continuing the  
12 case as requested outweigh the interest of the public and the defendant in a trial within the  
13 original date prescribed by the Speedy Trial Act.

14 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
15 et seq., within which trial must commence, the time period of February 27, 2023 to April 3,  
16 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
17 T4] because it results from a continuance granted by the Court at defendant's request on the basis  
18 of the Court's finding that the ends of justice served by taking such action outweigh the best  
19 interest of the public and the defendant in a speedy trial.

20 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
21 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
22 must commence.

23 IT IS SO STIPULATED.

24 Dated: February 22, 2023

PHILLIP A. TALBERT  
United States Attorney

25 /s/ JAMES R. CONOLLY  
26 JAMES R. CONOLLY  
Assistant United States Attorney

27 *[Signatures continue on following page.]*

28 Dated: February 22, 2023

/s/ DANIEL B. OLMOS

DANIEL B. OLMOS  
Counsel for Defendant  
SARAH ANDERSON,

Dated: February 22, 2023

/s/ DAVID D. FISCHER  
DAVID D. FISCHER  
Counsel for Defendant  
FABIAN GOMEZ

Dated: February 22, 2023

/s/ OLAF HEDBERG  
OLAF HEDBERG  
Counsel for Defendant  
EPIFANIO RAMIREZ

Dated: February 22, 2023

/s/ TASHA CHALFANT  
TASHA CHALFANT  
Counsel for Defendant  
WENDY LABUDA

Dated: February 22, 2023

/s/ JOHN R. MANNING  
JOHN R. MANNING  
Counsel for Defendant  
WILLIAM OWEN


Dated: February 22, 2023

/s/ TAMARA SOLOMON  
TAMARA SOLOMON  
Counsel for Defendant  
JOALEEN ROGERS,

**ORDER**

IT IS SO FOUND AND ORDERED.

Dated: February 22, 2023

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE